

Twomey, Hoppe & Gallanty LLP
757 Third Avenue, 7th Floor
New York, New York 10017
(212) 688-0400
(212) 688-1929 (Fax)

- and -

Williams Mullen
P.O. Box 1320
Richmond, Virginia 23218-1320
(804) 783-6459
(804) 783-6507 (Fax)

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X		
SHEA DEVELOPMENT CORP.,	:	07 Civ. 11201 (DLC) (GWG)
BRAVERA, INC., and IP HOLDING	:	
OF NEVADA CORP.,	:	
	:	PLAINTIFFS' NOTICE OF
Plaintiffs,	:	CROSS-MOTION TO ENFORCE
	:	SETTLEMENT AGREEMENT
- against -	:	AND FOR SANCTIONS
	:	
CHRISTOPHER WATSON, and	:	
ELIZABETH ANNE CONLEY,	:	<u>ORAL ARGUMENT REQUESTED</u>
	:	
Defendants.	:	
-----X		

PLEASE TAKE NOTICE that on the Declaration of Stephen E. Baril, Esq., dated August 29, 2008, and the exhibits attached thereto, the Declaration of Francis E. Wilde, dated August 29, 2008, the Declaration of Sheri Pantermuehl, dated August 29, 2008, the Memorandum of Law submitted herewith, the Transcript of the parties' Settlement reached in open Court dated July 10, 2008, and the prior papers and proceedings herein, Plaintiffs will move

this Court, at the date, time, and place of the return of the Defendants' Order To Show Cause dated August 18, 2008, for an order: (1) enforcing Plaintiffs' understanding of the parties' settlement on the record in this Court; and (2) pursuant to 28 U.S.C. 1927, and this Court's inherent powers, for an award of sanctions including attorney's fees and costs incurred herein in favor of Plaintiffs and against Defendants.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Order to Show Cause issued by Hon. Denise L. Cote dated August 18, 2008, papers in opposition to this cross-motion, if any, are to be served upon the undersigned on or before September 8, 2008.

Dated: New York, New York
August 29, 2008

WILLIAMS MULLEN

By: 
Stephen E. Baril (SEB -2728)

P.O. Box 1320
Richmond, Virginia 23218-1320
804.783.6459
804.783.6507 (FAX)

- and -

Twomey, Hoppe & Gallanty LLP
757 Third Avenue, 7th Floor
New York, New York 10017
212.688.0400
212.688.1929 (FAX)

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of August, 2008, a true and correct copy of the foregoing was sent by electronic mail and by Federal Express to:

James E. Davies
Landman Corsi Ballaine & Ford P.C.
120 Broadway, 27th Floor
New York, NY 10271-0079
jdavies@lcbf.com

A handwritten signature in black ink, appearing to read "J.E. Davies", is written over a horizontal line.

1651759v2